

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

IN RE:)	
)	
WARFIELD HISTORIC PROPERTIES, LLC, <i>et al.</i>,)	Case Nos. 24-12500; 24-12506; 24-12504 24-12508; 24-12511
)	
Debtors.)	(Jointly Administered Under Case No. 24-12500) Chapter 11
)	

* * * * *

**JOINT MOTION FOR (i) CONTINUANCE OF HEARINGS ON
CONFIRMATION OF DEBTORS' JOINT AMENDED CHAPTER 11 PLAN OF
REORGANIZATION, TOWN OF SYKESVILLE'S MOTION FOR ESTIMATION
OF CLAIMS, AND TOWN OF SYKESVILLE'S MOTION FOR RELIEF FROM STAY;
AND (ii) POSTPONEMENT OF CERTAIN RELATED FILING DEADLINES**

Warfield Historic Properties, LLC, Warfield Historic Quad, LLC, Warfield Center, LLC, Warfield Properties, LLC, and Warfield Restoration, LLC, the debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), and The Town of Sykesville ("Town"), by and through their respective undersigned counsel, hereby move this Court to continue the hearings scheduled for January 27, 2025 and February 3, 2025, and to postpone certain related filing deadlines. In support of this motion, the Debtor and the Town (collectively the "Movants") state as follows:

1. On November 14, 2024, the Debtors filed a Joint Amended Chapter 11 Plan of Reorganization (Docket 131) (the "Plan"), and the Court has scheduled a hearing to consider confirmation of the Plan for February 3, 2025.

2. On December 20, 2024, the Town filed a Motion seeking relief from the automatic stay to continue litigation pending in the Circuit Court for Carroll County, Maryland

(Docket 147) (the “Lift Stay Motion”), and scheduled a hearing on the Lift Stay Motion for January 27, 2025.

3. On December 20, 2024, the Town filed a Motion to estimate and allow for voting purposes the Town’s claims based upon prepetition breach of preservation and reversion agreements (Docket 146) (the “Estimation Motion”).

4. The Debtors have filed Oppositions to the Town’s two motions (Dockets 151, 152).

5. After conferring, the Movants have agreed to seek a continuance of the scheduled hearings and postponement of certain filing deadlines in light of the multitude and complexity of the issues involved.

6. Accordingly, and considering potential witnesses’ schedules and availability, the Movants respectfully request that the Court (i) schedule hearings on the Lift Stay Motion and the Estimation Motion for an available date between February 27, 2025, and March 14, 2025, and on confirmation of the Debtors’ Plan for an available date between March 31, 2025, and April 18, 2025; (ii) extend the deadline for submitting votes on the Debtors’ Plan until February 3, 2025; and (iii) extend the Town’s deadline to object to the Debtors’ Plan until February 20, 2025, without prejudice to any objections to confirmation of such Plan that the Town may have.

WHEREFORE, the Debtors and the Town respectfully request that this Court continue the hearings and postpone the filing dates as set forth above and grant such other relief as is just and proper under the circumstances.

Respectfully submitted,

SHULMAN ROGERS, P.A.

By: /s/ Michael J. Lichtenstein
Michael J. Lichtenstein (Bar No. 05604)
Benjamin P. Smith (Bar No. 17680)
12505 Park Potomac Avenue, Sixth Floor
Potomac, Maryland 20854
TEL: (301) 230-5231 (Lichtenstein)
(301) 230-5241 (Smith)
FAX: (301) 230-2891
Email: mjl@shulmanrogers.com
bsmith@shulmanrogers.com

Attorneys for Debtor

FUNK & BOLTON, P.A.

By: /s/ Bradley J. Swallow
Bradley J. Swallow (Bar No. 11250)
Eric S. Schuster, (Bar No. 03417)
100 Light Street, Suite 1400
Baltimore, MD 21202
TEL: (410) 659-8320
FAX: (410) 659-7773
Email: bswallow@fblaw.com

Counsel for The Town of Sykesville

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on the 8th day of January, 2025 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the **Joint Motion for a Continuance on Debtor's Confirmation Hearing, Sykesville's Motions for Estimation of Claims and Lift Stay Motion and Proposed Order** were served electronically by the Court's CM/ECF system on the following:

Lynn A. Kohen lynn.a.kohen@usdoj.gov

Robert B. Scarlett RScarlett@ScarlettCroll.com,
krynarzewski@scarlettcroll.com,
scarlettrr64434@notify.bestcase.com

Bradley J. Swallow bswallow@fblaw.com,
bswallow@fblaw.com

US Trustee - Greenbelt USTPRegion04.GB.ECF@USDOJ.GOV

I **FURTHER HEREBY CERTIFY** that copies of the foregoing **Joint Motion for a Continuance on Debtor's Confirmation Hearing, Sykesville's Motions for Estimation of Claims and Lift Stay Motion and Proposed Order** were mailed, postage prepaid this 8th day of January, 2025

20 Largest Unsecured Creditors on the attached List

Respectfully submitted,

SHULMAN ROGERS, P.A.

By: /s/ Michael J. Lichtenstein
Michael J. Lichtenstein (Bar No. 05604)
Benjamin P. Smith (Bar No. 17680)
12505 Park Potomac Avenue, Sixth Floor
Potomac, Maryland 20854
TEL: (301) 230-5231 (Lichtenstein)
(301) 230-5241 (Smith)
FAX: (301) 230-2891
Email: mjl@shulmanrogers.com
bsmith@shulmanrogers.com

Attorneys for Debtor

Absolute Landscape & Turf Services,
Inc.
4781 Ten Oaks Road
Dayton, MD 21036

Craver, Grothe, and Cox
303 West State Street
Centerville, OA 52544

Intelligent Office
1 Research Court, Suite 450
Rockville, MD 20854

Joseph Greenwald Laake, P.A.
6404 Ivy Lane, Suite 400
Greenbelt, MD 20770

Langley Realty Partners LLC
7954 Blitz Court
Dunn Loring, VA 22027

Perry, White, Ross and Jacobson
54 State Circle
Annapolis, MD 21401

Rosen Hoover
Sykes Brown, P.A.
300 Redland Court, Ste 203
Owings Mills, MD 21117

Sudow Kohlhagen, LLP
1000 Maine Avenue SW, Ste 325
Washington, DC 20024

Support Unlimited Inc,
212 Braeburn Drive
Walkersville, MD 21793

Waldon Studio Architects
31 Light Street, Ste 500
Baltimore, MD 21202

Warfield Land Condominium, Inc.
c/o HPS Management
424 N. Union Avenue
Havre De Grace, MD 21078

Warfield Property Owners Assoc.
c/o HPS Management
424 N. Union Avenue
Havre De Grace, MD 21078

52050.043: 238350.2